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**FILED**

APR - 4 2024

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities*  
7 *Commission*

10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16 PACIFIC GAS AND ELECTRIC  
17 COMPANY,

18 Debtors.

- 19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
21 ☒ Affects both Debtors

22 \* All papers shall be filed in the lead case,  
23 No. 19-30088 (DM)  
24  
25  
26  
27  
28

Bankr. Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administrated)

**DECLARATION OF WILLIAM B.  
ABRAMS IN SUPPORT OF  
WILLIAM B. ABRAMS MOTION TO  
STAY THE ADMINISTRATION  
EXECUTION AND ENFORCEMENT  
OF VICTIM RELEASES AS  
DEFINED WITHIN THE FIRE  
VICTIM TRUST AGREEMENT  
PENDING UNITED STATES  
SUPREME COURT RULING AND  
PURSUANT TO 11 U.S.C. § 105(A)**

**Hearing If Order Granted:**  
April 30, 2024 (Pacific Time) or as  
determined by the Court

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,  
2 hereby declare under penalty of perjury that the following is true and correct to the best of my  
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a  
5 pro se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire  
6 Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all  
7 claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our  
8 communities are safe from the growing risks of utility-caused wildfires. I have filed timely and valid  
9 damage claims as a victim of the 2017 PG&E Tubbs Fire.

10 2. I am a resident of Sonoma County and a ratepayer of Pacific Gas and Electric  
11 Company.

12 3. I submit this declaration in support of the "William B. Abrams Motion to Stay the  
13 Administration, Execution and Enforcement of Victim Claimant Releases as Defined within the Fire  
14 Victim Trust Agreement Pending United States Supreme Court Ruling and Pursuant 11 U.S.C. §  
15 105(A)" (the "**Motion**") filed concurrently herewith.

16 4. After the PG&E Fires of 2017, I felt compelled to engage as a party to certain  
17 proceedings at the California Public Utilities Commission to work collaboratively towards solutions  
18 that address wildfire mitigation and other utility/energy issues. Some of these proceedings are related  
19 to this case. All of my filed comments are in the public record through the Commission's website.  
20 As an intervenor in these proceedings, I have received some compensation from Investor Owned  
21 Utilities including Pacific Gas and Electric Company. I have no financial interests in this case that  
22 are adverse to those of victims. I have no litigation financing or lines of credit tied to PG&E  
23 shareholders, bondholders or any other party in this case. I have not and do not intend to get any  
24 compensation for my involvement in this case other than through my claim and those claims of my  
25 family through the PG&E Fire Victim Trust. I have not engaged in activities to undermine the value  
26 of the Fire Victim Trust or to slow the Trust administration process.

27 5. I declare under penalty of perjury that, to the best of my knowledge and after  
28 reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa  
Rosa, California on April 4, 2024.



William B. Abrams  
Pro Se Claimant